

Message

From: Clancy, Maeve [Clancy.Maeve@epa.gov]
Sent: 2/15/2019 1:29:26 AM
To: rtomp@sbcglobal.net
CC: Robinson, Derek J CIV NAVFACHQ, BRAC PMO (derek.j.robinson1@navy.mil) [derek.j.robinson1@navy.mil]; LEE, LILY [LEE.LILY@EPA.GOV]; Sanchez, Yolanda [Sanchez.Yolanda@epa.gov]; juanita.bacey@dtsc.ca.gov
Subject: RE: monitoring of radioactive fugitive dusts at Hunters Point Superfund site

Hi Dr. Tompkins,

EPA is in agreement with DTSC regarding their characterization of the previous air monitoring conducted at the Hunters Point Superfund site and planned monitoring during the re-work activities on Parcel G. I also agree with Nina's suggestion to contact Derek Robinson of the Navy directly for more information.

Thank you.

Maeve Clancy
EPA Region 9
Remedial Project Manager
Superfund Division (SFD-8-3)
415-947-4105, clancy.maeve@epa.gov

From: Bacey, Juanita@DTSC <Juanita.Bacey@dtsc.ca.gov>
Sent: Wednesday, February 13, 2019 4:07 PM
To: rtomp@sbcglobal.net
Cc: Clancy, Maeve <Clancy.Maeve@epa.gov>; Robinson, Derek J CIV NAVFACHQ, BRAC PMO (derek.j.robinson1@navy.mil) <derek.j.robinson1@navy.mil>; LEE, LILY <LEE.LILY@EPA.GOV>
Subject: RE: monitoring of radioactive fugitive dusts at Hunters Point Superfund site

Hi Dr. Tompkins,

Thank you for reaching out to Maeve and me on this very important matter. Appropriate air and dust monitoring during all remediation work, including the radiological rework, at the Hunters Point Naval Shipyard is very important to DTSC. I will try my best to answer your questions from the memo you sent us dated February 12, 2012.

- In regards to Mr. Robinson's statement at the CAC subcommittee meeting on January 28, 2019 that the "Bay Area Air Quality Management District is responsible for radioactive fugitive dust monitoring leaving the worksite.", I attended the meeting and I do not recall that response. We recommend that you reach out to Mr. Robinson directly for clarification (derek.j.robinson1@navy.mil).
- The Navy is responsible for monitoring radionuclides in air (fugitive dust). The Navy has been doing this at the Site for areas where there are Radionuclides of Concern (ROCs) being addressed. DTSC along with the CA Department of Public Health (CDPH) and the US EPA oversee the work conducted by the Navy.
- The standards for radioactive air monitoring can be found in the Basewide Dust Control Plan (2010; Section 5.2) and the Basewide Radiological Support Final Work Plan (Aug. 2015; Section 7.10). The DTSC Envirostor link for both of these documents is below. Per CDPH, they meet California standards. We are not aware of any exceedances of these standards at the HPNS site. It's important to note that the majority of the radiation found at the site was in the form of commodities (radial dials, etc.) which are not prone to releases into the air.
https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/1107344686/ECSD-4808-0003-0003%20Fn%20Work%20Plan_CD.pdf
https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/5014744400/Final%20Basewide%20Dust%20Control%20Plan%20Rev%201.pdf

- As for the methods that will be used for monitoring at Parcel G during the radiological rework, we expect the methods will be consistent with what was done in the past. The Navy is currently preparing a draft dust monitoring plan for review by the regulatory agencies for the Parcel G radiological rework. This dust monitoring plan must include the equipment to be used, laboratory analysis low enough to achieve the standards, and the locations of the air monitoring stations.
- The monitoring that has been conducted in the past, one upwind and one downwind (at a minimum) has been and continues to be conducted at fieldwork active areas and includes PM10 dust monitoring, air monitoring for various chemicals of concern (COCs) and ROCs in areas of concern.
- DTSC has not conducted microclimate studies; however, we have conducted our own dust monitoring (PM10) adjacent to residential areas above Parcel E-2 during remedial activities. The purpose of our monitoring was to ensure that the Navy dust suppression activities were being practiced and that dust levels were not exceeding the established criteria. DTSC's industrial hygienist conducted the monitoring on various days and times and did not observe impacts/exceedances from the site at their various monitoring locations, including those adjacent to residential areas above Parcel E-2. These brief reports include wind and weather conditions and can be found on DTSC Envirostor (links below).
https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=38440005 (See Activities Tab, dates 6/21/2017 to 1/12/2018)
- In regards to Parcel E-2, as indicated above, air monitoring for radionuclides has been and will continue to be monitored during remediation in areas with radionuclide concerns. This includes when the soil/sewage lines were removed and around radiological screen yards (RSY pads) where soil is spread out to be scanned. Radiological reports produced for the Site include this information and are available on Envirostor. This information is in the two documents indicated above. DTSC is not aware of any air monitoring (dust or chemical/ROC) conducted beyond the perimeter of the parcels by the Navy. The Navy would have to address this question.
- In regards to handheld Geiger counter being the only instrument used at the Site, No, this is not correct. The Navy radiological work plans and reports indicate the various equipment used. This information can also be found in the two documents above.

DTSC recommends you contact Derek Robinson at the Navy if you need more detailed information. Thank you.

Nina Bacey, Project Manager
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-----Original Message-----

From: rtomp@sbcbglobal.net [mailto:rtomp@sbcbglobal.net]
Sent: Tuesday, February 12, 2019 11:50 PM
To: Clancy.Maeve@epa.gov
Cc: Bacey, Juanita@DTSC <Juanita.Bacey@dtsc.ca.gov>
Subject: monitoring of radioactive fugitive dusts at Hunters Point Superfund site

Ms. Maeve (EPA) Ms. Bacey (DTSC)

Please review the attached memo, I look forward for us having a discussion on the concerns are shared by the residents in Bayview Hunters Point.

Thank you

Dr. Raymond Tompkins
